



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*300 Quarropas Street
White Plains, New York 10601*

August 13, 2020

By ECF and Email

The Honorable Cathy Seibel
United States District Judge
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Re: *United States v. Steven L. Crea*, S18 17 Cr. 89 (CS)

Dear Judge Seibel:

The parties write jointly pursuant to the Court's order of August 10, 2020, to propose a briefing schedule for the outstanding issues related to forfeiture. The parties propose that the defendant submit his brief on August 20, 2020. If the Government wishes to make any further affirmative arguments concerning forfeiture, the Government will also file a brief on August 20, 2020. The parties may file responses to each other's briefs, addressing only the arguments raised in those briefs, on August 24, 2020.

The Government does not intend to submit any new evidence. If the Government files an affirmative brief on August 20, 2020, it intends only to offer legal authorities and to cite to the record, if necessary. The defendant will in the first instance submit any additional evidence by affidavit attached to his August 20, 2020 brief. If, as appears possible, the Government does not wish to contest the facts submitted in those affidavits (but rather only their legal import), no evidentiary hearing will be necessary. The Government will state its position on whether it requests an evidentiary hearing concerning any matter asserted by affidavit in its response brief filed on or before August 24, 2020. The parties continue to discuss whether an agreement as to

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the appropriate forfeiture amount is possible. Should the parties reach agreement, they will promptly inform the Court.

Respectfully submitted,

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STEVEN L. CREA
Defendant

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cc: Counsel of Record (by ECF)